Filed 05/28/2008

Page 1 of 4

30 Rockefeller Plaza, New York, NY 10112 tel (212) 408-5100 fax (212) 541-5369

## CHADBOURNE & PARKELLP

Gretchen N. Werwaiss direct tel (212) 408-1112 fax (646) 710 1112 gwerwaiss@chadbourne.com

May 27, 2008

page can be added to the The Court has already so

Honorable John G. Koeltl United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 1030 New York, NY 10007

VIA FACSIMILE: (212) 805-7912

Re: Stipulation and Consent Order of Confidentiality:

New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund v. Purdue Pharma, Civil Action No. 07-cv-6916-JGK ("New Mexico Case")

American Federation of State, County and Municipal Employees, District Council 47 Health and Welfare Fund et al. v. Purdue Pharma, Civil Action No. 07-cv-8761-IGK ("American Federation Case")

Dear Judge Koeltl:

We represent defendants Purdue Pharma L.P., Purdue Pharma, Inc., The P.F. Laboratories, Inc. and The Purdue Frederick Company Inc. (the "Purdue Defendants") and Michael Friedman, Howard Udell, and Paul Goldenheim (the "Individual Defendants") in the above-referenced actions.

On May 20, 2008, on behalf of all parties, we submitted via e-mail a Stipulation and [Proposed] Consent Order of Confidentiality (the "Proposed Confidentiality Order") in connection with the above-referenced cases. At that time, we inadvertently omitted the signature page reflecting the consent of Plaintiffs' counsel to the terms of the Proposed Confidentiality Order.

The Proposed Confidentiality Order was "so ordered" by the Court on May 21, 2008 in both the *New Mexico* case (Dkt. 88) and the *American Federation* case (Dkt. 27). For purposes of completeness, and for the Court's convenience, we enclose herewith the signature

USDS SDNY	
DOCUMENT	
ELECTRONIC	ALLYFILED
DOC #:	- LILLD
DATE FILED:	5/28/08
w vvarsave (a Polish purlane	STORY AND AND STORY

New York Washington Tos Angeles Houston London (a multinational partnership) Moscov

## CHADBOURNE & PARKELLP

Honorable John G. Koeltl

-2**-**

May 27, 2008

y 100 mg

page reflecting the consent of Plaintiff's counsel as well as the signature page reflecting the consent of the Abbott Defendants' counsel, which was also not included in the above-referenced docket entries.

Respectfully submitted,

Gretchen N. Werwaiss

Enclosures

cc: Counsel for Plaintiffs and the Proposed Class

Jonathan Shub Seeger Weiss, LLP

VIA FACSIMILE

cc: Counsel for the Abbott Defendants

M. King Hill, III Venable LLP

VIA FACSIMILE

This 16th day of May, 2008.

Jonathan Shub
TerriAnne Benedetto
Seeger Weiss LLP
1515 Market Street - Suite 1380
Philadelphia, PA 19102
Telephone: (215) 564-2300
Facsimile: (215) 851-8029

James R. Dugan, II
Arnold Levin
Fred Longer
Charles Schaffer
Levin Fishbein Sedran & Bennan
510 Walnut Street, Suite 500
Philadelphia, PA 19106

Arthur Sadin Sadin Law Firm 121 Magnolia Street, Suite 102 Friendswood, TX 77546

Shane Youtz Youtz & Valdez 420 Central Avenue, Southwest Albuquerque, NM 87102 Respectfully Submitted,

SEÈGER WEISS/LL

Christopher A. Seeger (CS-4880)

David R. Buchanan
One William Street
New York, NY 10004
Telephone: (212) 584-0700
Facsimile: (212) 584-0799

Douglas R. Plymale
Stephen B. Murray, Jr.
Stephen B. Murray, Sr.
Justin Bloom
Murray Law Firm
650 Poydras Street, Suite 2150
New Orleans, LA 70130
Telephone: (504) 648-0180
Facsimile: (504) 648-0181

Stewart L. Cohen Cohen Placitella & Roth Two Commerce Square, Suite 2900 2001 Market Street Philadelphia, PA 19103

Steven A. Schwartz Chimicles & Tikellis, LLP 361 W. Lancaster Avenue Haverford, PA 19041

William D. Marvin Cohen, Placitella & Roth, P.C. 2100 Market Street, Suite 2900 Two Commerce Square Philadelphia, PA 19103

Counsel for Plaintiffs

Donald I Strauber
Mary Therese Yelenick
Phoebe A. Wilkinson
Chadbourne & Parke LLP
30 Rockefeller Plaza
New York, NY 10112
Telephone: (212) 687-9818
Facsimile: (212) 541-5369

Chilton D. Varner
Robert K. Woo, Jr.
Stephen B. Devereaux
Dan H. Willoughby, Jr.
King & Spalding LLP
1180 Peachtree Street, NE
Atlanta, GA 30309

Timothy C. Hester, Esq.
Mark H. Lynch, Esq.
Patrick S. Davies, Esq.
Covington & Buding LLP
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401

Counsel for the Purdue Defendants and the Individual Defendants

M. King Hill III
Venable LLP
PNC Bank Building
Two Hopkins Plaza, Suite 1800
Baltimore, MD 21201
Telephone: (410) 244-7400
Facsimile: (410) 244-7742

Counsel for the Abbott Defendants

SO ORDERED.

Dated:

John G. Koeltl, U.S.D.J.